

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

TOM COLTHURT (CABN 99493)
Chief, Criminal Division

MICHAEL J. MORSE (CABN 291763)
JUAN M. RODRIGUEZ (CABN 313284)
Special Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (213) 894-7367/0304
FAX: (213) 894-7631
michael.morsel@usdoj.gov
juan.rodriguez@usdoj.gov

Attorney for Petitioner United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND
MALAMATENIA MAVROMATIS,

Defendants.

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE
STATUS CONFERENCE FROM
FEBRUARY 22, 2024 AT 1:30 P.M., TO
JULY 11, 2024 at 1:30 P.M. AND
EXCLUDE TIME UNDER THE
SPEEDY TRIAL ACT; AND
[PROPOSED] ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from
February 22, 2024, at 1:30 p.m. to July 11, 2024, at 1:30 p.m.

1 1. Defendant BABAK BROUMAND is in custody in the Central District of
2 California after being convicted at jury trial in the related case of *United States v. Broumand*,
3 20-224-RGK(A).

4 2. The government has produced over 60,000 pages of discovery to defendant
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,
6 mortgage broker, title company, and escrow company records, tax returns, and witness
7 interview reports.
8

9 3. On March 24, 2022, the government obtained a superseding indictment in this
10 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
11 which she was charged with two counts of False Statements on a Loan Application in
12 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
13 indictment, co-defendant BABAK BROUMAND had already been charged.
14

15 4. Counsel for both defendants agree that additional time is needed for meaningful preparation
16 for trial, including additional research and investigation, and discussions with their clients and
17 the government regarding possible pretrial resolution. The parties are currently engaged in
18 earnest pretrial resolution discussion that may obviate the need for trial. The government
19 extended a proposed global disposition on October 19, 2023. The proposed global disposition
20 related to tax charges and required defense counsel to consult with outside subject matter
21 experts to effectively advise their clients. As a result, the parties met and conferred. On
22 January 29, 2024, the government again extended a proposed global disposition, taking into
23 account issues raised by counsel during negotiation. Counsel for Mr. Broumand represents
24 that he has not yet been able to meet with Mr. Broumand regarding the government's proposed
25 disposition due to scheduling difficulties related to Mr. Broumand's incarceration.
26
27
28

1 Thus, both defendants agree more time is needed to review, and advise their clients on
2 the government's proposed global disposition in this matter, and prepare for a potential jury
3 trial should negotiations fail.

4
5 5. The government and counsel for the defendants agree that time be excluded under
6 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in
7 pretrial resolution discussions.

8
9 6. The parties stipulate and agree that excluding time until July 11, 2024, will allow
10 for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further
11 stipulate and agree that the ends of justice served by excluding the time from February 22,
12 2024, through July 11, 2024 computation under the Speedy Trial Act outweigh the best
13 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

14
15 7. The parties are also discussing resolution of this entire matter and require more time
16 to discuss different settlement alternatives. The parties believe that they are close to reaching
17 a pretrial resolution and in the event they do so will seek to stipulate to advance the status
18 conference to a date and time convenient for all parties and the Court.

19 //

20 //

8. The undersigned Assistant United States Attorneys certify that they have obtained approval from all counsel to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: February 20, 2024

/s/ Michael J. Morse
MICHAEL J. MORSE
JUAN M. RODRIGUEZ
Special Assistant United States Attorney

DATED: February 20, 2024

/s/ Steven F. Gruel
STEVEN F. GRUEL
Counsel for Defendant BROUMAND

DATED: February 20, 2024

/s/ Paul H. Nathan
PAUL H. NATHAN
Counsel for Defendant MAVROMATIS

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the status conference from February 22, 2024, at 1:30 p.m. to July 11, 2024, at 1:30 p.m.

Furthermore, the Court finds that failing to exclude the time from February 22, 2024, through July 11, 2024, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from

1 February 22, 2024, through July 11, 2024, from computation under the Speedy Trial Act
2 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and
3 with the consent of the parties,
4

5 IT IS HEREBY ORDERED that the time from February 22, 2024, to July 11, 2024,
6 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A),
7 (B)(iv).
8

9 IT IS SO ORDERED.
10

11
12 DATED:

HONORABLE WILLIAM H. ORRICK
United States District Court
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28